Questions and Answers on Greenhouse Gas Reporting (O.Reg. 452/09)

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Questions and Answers on Greenhouse Gas Reporting (O.Reg. 452/09)

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Greenhouse Gas Reporting

1. **For general stationary combustion, how are you required to calculateCH_4 and N_2O emissions from the combustion of biomass?**

   The facility may use calculation methods ON.24(b), ON.24(c) or ON.24(d) to calculate CH_4 and N_2O emissions from the combustion of biomass. The requirements for sampling and analysis of fuels, including biomass, are outlined in ON.25. For biomass, ON.25(a)(8) clarifies the sampling requirements for high heat value (HHV) or carbon content is determined annually if the facility used equation 20-2 or 20-4 for calculating CO2 emissions.

   The default emission factor method under ON.24(a) (equation 20-10) should only be used to calculate CH_4 and N_2O emissions from natural gas combustion, not for the combustion of biomass (see ON.24(g)(1) of the Guideline).

2. **Do the emissions from the combustion of biomass count towards determining if my facility exceeded the 25,000 tonne threshold?**

   Subsection 5(4) of the Regulation allows a facility to deduct all of the CO_2 emissions from the combustion of biomass from its total facility emissions when determining if it exceeds the emission threshold of 25,000 tonnes CO_2e (under subsection 5(1) of the Regulation). Section 1 of the Regulation provides a definition of biomass.

   The CH_4 and N_2O emissions from the combustion of biomass are included as part of the total CO_2e emissions for the purpose of determining if a given facility exceeds the 25,000 tonne emission threshold.

   If a facility emitted more than 25,000 tonnes, then it has to report all of its greenhouse gas (CO_2, CH_4 and N_2O) emissions from the combustion of biomass. No verification is required for the CO_2 emissions from the combustion of biomass (see subsection 10(2) of the Regulation) but the CH_4 and N_2O emissions are subject to verification.

3. **If a fuel is not listed in Tables 20-2, 20-3, 20-4 or 20-6 in ON.20, do you have to calculate and report the CH_4 and N_2O emissions for that type of fuel?**

   The person is not required to calculate and subsequently report the annual CH_4 and N_2O emissions for fuels that are not listed in Tables 20-2, 20-3, 20-4

and 20-6. It is optional to use engineering estimates to calculate and report the annual CH_4 and N_2O emissions for fuels that are not listed in these tables.

4. How do I report my cogeneration emissions and other data?

Any stationary combustion device that is associated with the generation of electricity should have its emissions reported under ON.40 – Electricity Generation and Cogeneration. Stationary combustion devices in cogeneration systems may include a number of different technologies, including steam turbines, gas turbines, compression ignition engines (e.g., diesel) or spark ignition (e.g., natural gas) engines.

Emissions from a boiler that is used to generate steam for a steam turbine/electricity generator should be reported under the Electricity Generation and Cogeneration (ON.40) source. When a facility reports boiler emissions under ON.40, it should include all of the useful thermal outputs (e.g., include all of the steam used in process heating other than electricity generation) for the year.

Any chemical recovery combustion unit (i.e., kraft, soda, sulfite, or semi-chemical recovery combustion unit) that is used in a cogeneration system should have its emissions reported under ON.40 - Electricity Generation and Cogeneration.

The by-products from manufacturing processes (e.g., iron manufacturing) can be used as process fuels (e.g., coke oven gas, blast furnace gas, basic oxygen furnace gas) in boilers to generate steam for process heating or electricity generation. Where these process fuels are used in a cogeneration system, we recommend that the facility report the emissions from these process fuels under the source (e.g., ON.150 – Iron Manufacturing), not under ON.40 Electricity Generation and Cogeneration.

If the process fuels from iron manufacturing are transferred off-site for use in cogeneration or other general stationary combustion sources, then the recipient of the process fuel should report the emissions under ON.40 Electricity Generation and Cogeneration or ON.20 General Stationary Combustion.

5. If the heat content of the natural gas is available from the supplier, does it mean I have to report CO_2 emissions using Calculation Methodology 2 (ON.23(b))?

The relevant provisions for the calculation of CO_2 emissions under the Stationary Combustion Equipment Methodology are set out under

ON.23(e)(1)(A) and (E) as follows:

(1) Calculation Methodology 1 (Equation 20-1)

(A) May be used for a facility for the combustion of natural gas with a high heat value between 36.3 and 40.98 MJ per cubic meter, and for the combustion of any of the fuels listed in Table 20-1a.

(E) May not be used at a facility emitting at any level for a fuel for which the person routinely perform fuel sampling and analysis for the fuel high heat value or can obtain the results of fuel sampling and analysis for the fuel high heat value from the fuel supplier at the minimum frequency specified in ON.25(a), or at a greater frequency. In such cases, Calculation Methodologies 2, 3 or 4 shall be used for those fuels.

Therefore, if a facility can obtain the high heat value (HHV) results from the supplier, Calculations Methodology 1 should not be used. The facility may use Methodology 2 for natural gas; but, it can also use Methodologies 3 and 4.

6. Can we use the high heat values (HHV) posted by my natural gas suppliers to calculate the greenhouse gas emissions from the combustion of natural gas used at my facility?

Yes. ON.25(c) allows for the use of high heat values based on results of fuel sampling and analysis received from the fuel supplier.

The high heat value and chemical composition from the natural gas supplier can both be used to calculate the greenhouse gas emissions from the combustion of natural gas used at the facility. The information on the high heat value for natural gas may be available at the following links:

http://www.energyontario.ca/tools/gas-tables.html

https://www.enbridgegas.com/corporate/environmental-commitment/ghg-reporting.aspx

Please note that the values that are published may be the same as the default HHV that is currently in Table 20-1 of the Guideline (0.038 GJ/m^3).

7. I have continuous emissions monitors (CEMS) for CO_2 but I do not have a stack gas flow monitor. Can I use Calculation Methodology 4 (ON.23(d))?

No. Any facility that uses CEMS must ensure the system includes both a CO_2 concentration monitor and a monitor that directly measures stack gas flow. Stack gas flows that are based on calculations (e.g., such as f-factors in *Performance Specifications for Continuous Monitoring of Gaseous Emission From Thermal Power Generation* (Report EPS 1/PG/7) Dec 2005) are not considered to be valid for the purposes of ON.23(d).

8. I do not have manufacturing sources listed in the Regulation or the Guideline, but I do combust fuel at the facility. Do I have to report under Regulation 452/09?

Yes. Facilities that only have emissions from fuel combustion and not from any of the other sources listed in subsection 2(1) of the regulation would still have to report under the general stationary combustion source if those emissions meet the emissions threshold requirements (25,000 tonnes or more of $CO2_e$) under subsection 5(1) of the Regulation.

9. Where do I report hydrogen production emissions?

Report emissions for hydrogen production under ON.130 if the annual mass of hydrogen production is higher than the other individual production of both ammonia and methanol.

Report the hydrogen production under ON.80 (ammonia manufacturing) if the annual mass of ammonia produced is higher than the individual production of both hydrogen recovered as product and methanol. Report under ON.300 (petrochemical production) if the amount of methanol produced is higher than the individual production of both hydrogen recovered as product and ammonia.

Hydrogen plants that are owned or controlled by the refinery may also report the hydrogen plant emissions under ON.202.

10. Can I use alternate emission quantification methods this year?

No. All facilities have to use the standard quantification methods in accordance with subsections 4(1) to (5) of the Regulation.

While subsection 4(6) of the Regulation allowed for the use of “best alternative quantification methods” set out in the Guideline” for the 2010 emissions year in some circumstances, facilities are not able to use the “best alternative quantification methods” for the calculation of emissions in 2011 or any subsequent year.

11. If I am using a calculation method (e.g., method A) this year, can I use another calculation method (e.g., method B) for next year's emissions?

A facility can only change its calculation method to another method in the Guideline for the calculation of emissions from the same source upon written consent from the Director.

The standard quantification methods are listed in section 4 of the Guideline and provided in the Appendices of the Guideline.

12. What are the fuel flow monitoring and flow meter calibration requirements for general stationary combustion sources?

Fuel consumption monitoring requirements for general stationary combustion sources are outlined in ON.25(b) of the Guideline. For any fuel, the facility may determine fuel consumption from direct measurements, records of fuel purchases or sale invoices.

All oil and gas flow meters used to monitor fuel consumption shall be calibrated prior to the first year of reporting (except for natural gas billing meters) using procedure specified by the manufacturer or Measurement Canada. They should also be recalibrated:

- Once every three years; or
- Upon replacement; or
- Minimum frequency specified by the manufacturer; or
- Minimum frequency under the laws and regulations of Measurement Canada.

For orifice, nozzle and venturi flow meters, the calibration shall consist of in-situ calibration of the differential pressure, total pressure and temperature transmitters.

Facilities that use fuel oils can use tank drop measurements or mass flow meters (with density measurements).

There are no specific requirements for consumption monitoring for solid fuels.

There are source specific flow measurement provisions for products, feed material, process fuels in each of the standard quantification methods (e.g., refinery fuel gas, petroleum refining, steel manufacturing, pulp and paper) Facilities must review and follow the specific requirements in the sampling, analysis and measurement requirement sections of each of the standard quantification method for that source.

13. Do you have to report emissions from pollution control equipment such as incinerators for gaseous pollution streams?

The CO_2 emissions from pollution control equipment such as incinerators emissions consist of combustion by-products from the fuel and the air pollutants in the gaseous pollution stream.

The contribution to the CO_2 emissions from the pollution control equipment may be very small and could be excluded if it meets the provisions under ON.23.

The provision in the first paragraph of ON.23 allows a facility to exclude the reporting of emissions from fuels (e.g., air pollutant) that are not listed in any of the tables as long as the total emissions from all such fuels do not exceed 0.5% of the total facility emissions.

Note that fuels which are listed in the tables (e.g., natural gas) and used in the incinerator should be reported as emissions under ON.20 General Stationary Combustion.

14. Do you have to report fugitive greenhouse gas emissions from air conditioning units, fire extinguishers and refrigeration units?

No. Facilities that do not generate electricity do not have to report greenhouse gas emissions from air conditioning units, fire extinguisher or refrigeration units since there are no quantification methods in the Guideline for these types of sources.

Operators of electricity generating facilities are required to report Hydroflourocarbons (HFC) emissions under ON.43(d) from cooling units that support power generation or are used in heat transfer to cool stack gases. Such facilities are not required to report HFC emissions from heating and ventilation systems used for cooling of control rooms, offices and buildings.

15. If the emission source is not listed and there is no applicable calculation methodology for the emissions, does the facility have to develop its own calculation method and report it under the Regulation (e.g., purging emissions)?

No. You are not required to report emissions from greenhouse gas emission sources other than those listed under subsection 2(1) of O. Reg. 452/09.

The reporting requirement for sources is outlined in Sections 2 through 5 of the Regulation. Only facilities that have sources listed under Section 2 that are covered by a standard quantification method (SQM) in the Guideline have to quantify their emissions in accordance with Section 4. At this time facilities do not have to report on sources that are not currently listed in Section 2 or that do not have an SQM.

16. Where should I report the CO_2 that is generated at the facility, captured and transferred off site to another facility?

The amount of CO_2 generated at the facility that is captured and subsequently used, transferred or stored offsite should be reported on the CO_2 Captured screen of the ON Greenhouse Gas module in Single Window.

The facility should not deduct the amount of CO_2 that is captured from the calculated quantities it is required to report under other emissions sources.

17. Can I use missing data procedures to correct for emissions from missing samples?

Yes. Procedures for estimating missing data are outlined in each of the standard quantification methods.

However, despite the presence of missing data procedures in the Guideline, reporters should be aware that excessive amounts of missing data could introduce a level of uncertainty in the emissions statement that may be interpreted as a material discrepancy by a third party verifier under subsection 10(5) of the Regulation, leading to an adverse verification statement.

18. If my facility's emissions were over 25,000 tonnes (excluding emissions from combustion of biomass) in a previous year, but have since dropped to below 25,000 tonnes, what are the requirements for reporting and verification?

Subsection 5(2) of the Regulation does not allow a facility to cease reporting unless it demonstrates that it has generated less than 25,000 tonnes of CO_2e for three consecutive years.

A facility can, therefore, only cease reporting if it has complied with the Regulation by submitting emissions reports and verification statements for three consecutive years, each demonstrating that its emissions were below the threshold. If emissions at the facility exceed 25,000 tonnes of CO_2e again during any reporting period, then the facility must resume reporting.

19. What is a facility required to do if it has closed permanently?

Under subsection 5(3) of the Regulation, reporting requirements cease to apply to a facility if the facility ceases operation permanently and the facility submits notice to the Director stating such. The facility must also submit a report for the final reporting period (i.e., emissions for the portion of the year that it operated in the year of closure need to be reported by June 1 of the following year) and the report is to be verified (if there are emissions in and after 2011).

You can submit a notice under subsection 5(3) via email to GHGReporting@ontario.ca

The notice should be addressed to:

Director
Environmental Monitoring and Reporting Branch
Ministry of the Environment
125 Resources Road
Toronto ON M9P 3V6

The notice should include the following information:

- name of the facility
- address of the facility
- NPRI number of the facility (if there is one)
- date that the operation permanently ceased operation;
- status of the emissions report for the final reporting period;
- status of the verification report for the final emissions report (if one was required).

20. Does an education facility with multiple buildings in the same area have to report as a single facility?

Yes. Subsection 1(1) of the Regulation defines a facility as all buildings, equipment, etc. that are owned or operated by the same person and are located on a single site, or on two or more contiguous or adjacent sites that function as a single integrated site.

Therefore, a large campus with many buildings spread out over a number of roads and located on two or more contiguous or adjacent sites, should be considered as a single facility for the purpose of reporting under the Regulation.
However, if the educational organization has campuses that are located at a

distance from each other (e.g., two campuses across town from each other), the campuses would not be considered to be a single contiguous site and should be treated as separate facilities for reporting purposes under the Regulation.

21. I have facilities (non natural gas pipeline) that are located several kilometres away from each other; do the emissions from both facilities have to be reported in a single emissions report?

Subsection 1(1) of the Regulation defines a facility as buildings, equipment, etc. that are owned or operated by the same person and are located on a single site, or on two or more contiguous or adjacent sites that function as a single integrated site.

Therefore, if your facilities are located several kilometres apart from each other and are not contiguous sites and do not operate as a single integrated site then they should be treated as separate facilities for reporting purpose under the Regulation.

22. Who is responsible for submitting the 2012 annual GHG report if a facility changes ownership at some point during the reporting year?

Subsection 2 (2) of the Regulation indicates that the person generating the GHGs on the last day of the reporting period would be required to comply with the Regulation. For example, if a facility was sold in June 2012, the owner who is operating the facility on December 31st 2012 would be the person responsible for submission of the GHG report. It remains the responsibility of the person submitting the report to perform the appropriate due diligence at the time of purchase to ensure that all regulatory requirements can be met.

Third-Party Verification

23. Who can perform verifications of emission reports? Does the ministry provide verifier contact information?

The Regulation requires a verification body to be accredited by a member of the International Accreditation Forum (IAF) in accordance with ISO 14065 . Both the Standards Council of Canada (SCC) and the American National Standards Institute (ANSI) are members of the IAF that run GHG accreditation programs.

Reporting operations can find listings of accredited verification bodies (AVB's) with contact details through the following links:

- Standards Council of Canada (SCC) - Directory of Accredited Clients
- American National Standards Institute (ANSI) - Accredited Bodies

24. What is the estimated cost of verification?

The cost of verification depends on a number of facility-specific factors that do not necessarily relate to the size of the operation. The cost can vary significantly based on the following factors:

- The complexity of the facility whose emissions are being verified
- The complexity of the sector in which the reporter operates
- Familiarity with the facility whose emissions are being verified. An initial verification is often more costly than subsequent verifications performed by the same accredited verification body (AVB), since the AVB needs to become familiar with the documentation, procedures, operations and staff of the facility
- Transparency and completeness of the information provided to the AVB. The more transparent and complete the information provided the less time and effort (and therefore cost) needed to complete the verification.
- Controls surrounding the GHG information. Ensuring that the collection of GHG information is under adequate control is another good approach reporters can use to lower verification cost, since lower control risks typically result in less time spent by the AVB sampling data.

25. Will there be a Compromised Impartiality Assessment template available for Accredited Verification Bodies?

Yes. You can download the template from MOE website.

26. What information should be included in a verification statement and is there a Verification Statement template available for AVB?

The verification statement must satisfy all of the requirements of the Regulation. This includes but is not limited to, the requirements set out in s.13 and the requirement set out in s.11(2), which stipulates that the verification statement must meet requirements set out in clause 4.9 of ISO 14064-3.

An AVB should use the verification statement template, which can be downloaded from the MOE website.

27. What constitutes a positive verification statement? Is it both free of material misstatement and in conformance with the Regulation? Are these two items separate?

A positive verification statement requires that the emissions data report is both free of material misstatements and conforms to the requirements of the Regulation and the Guideline for Greenhouse Gas Emissions Reporting.

Material misstatements include errors and omissions, individually or in aggregate, identified in the course of the verification, that make it probable that there is more than a 5% discrepancy in the total emissions reported for the facility.

Conformance with the Regulation is following the requirements set forth in the Guideline and the Regulation, and it should be assessed by verifiers as objectively as possible.

These two requirements are assessed separately, but failure to meet either of these requirements would result in an adverse verification statement. For example, a non-conformance that does not result in a material misstatement in total reported emissions may still result in an adverse verification statement.

28. What happens if a reporter receives an adverse verification statement?

There is no penalty for adverse verification statements in the Regulation.

The ministry will work with reporters to determine a plan for the facility to rectify the issues causing the adverse statement. However, adverse verification statements will be evaluated and specific compliance actions will be determined on a case by case basis since the existence of an adverse verification statement may indicate non-compliance with a provision in the Regulation or Guideline.

29. Should an AVB include any qualifications or limitations on the verification statement for an adverse verification statement?

Yes. The adverse verification statement should include any information that describes the cause of the adverse opinion. ISO 14064-3 clause 4.9 *Validation and Verification Statement* outlines what must be contained in a verification statement and Annex A.2.9 provides additional guidance.

Before submitting an adverse verification opinion to the reporter, the AVB must provide the reporter with written notice of the nature of the error, omission, misstatement or non-compliance that it identified (as per subsection 11(1)(b)).

30. What happens if an AVB and a reporter are unable to resolve a dispute regarding the verification opinion?

According to subsection 11(3) of the Regulation, if a reporter receives notice of an adverse verification opinion from an AVB, the reporter can request that the Director review the AVB's opinion within seven days of receiving the notice. The reporter must notify both the Director and AVB of the request.

31. What should an AVB do if it discovers a non-conformance that cannot be corrected?

It is the AVB's responsibility to assess conformance with the requirements of the Regulation and impartially render a verification opinion.

While many non-conformance issues can be corrected before the verification deadline, in some cases, corrections may not be possible. For example, if a reporter did not collect the required data or used inaccurate fuel meters, it is generally impossible to correct such issues.

If a non-conformance that cannot be corrected is discovered during the verification, the facility is still required to submit a verification statement to the ministry. In such a case, the AVB would complete the verification engagement, assessing for material misstatement and issuing an adverse verification statement if appropriate.

32. How many site visits are required by a verifier for compressor stations for pipeline facilities?

Subsection 10(6) of the Regulation outlines the requirements for when a facility must be visited by an AVB.

A verifier may also deem one or more site visits to be necessary to achieve the required level of assurance for the verification statement. Since the Regulation does not specify the number or type of site visits that must be undertaken, this would be at the discretion of the AVB.

33. If facilities are visited and audited as part of a "pre-verification" process, will each facility need to be visited again for the actual verification process?

If a site visit by the verifier is required under subsection 10(6) of the Regulation, then the verifier must visit the site regardless of any "pre-verification" activities that took place.

34. If a facility were to commission the same verification body over several years, is a facility visit by the AVB only required once every three years?

Yes. Under subsection 10(6)(b), the AVB at a minimum must visit the facility once every three years, assuming all the requirements in subsections 10(6)(a), (c), (d) and (e) are also satisfied.

35. Are there any specific constraints on an AVB related to providing GHG consultancy services to a facility after having conducted third-party verification(s) for that same facility?

No. There are no specific constraints on an AVB related to providing GHG consultancy services to a facility after having conducted verifications for that same facility.

However, if the AVB wants to resume conducting verifications after providing consultancy services for that facility, the AVB must develop and submit a conflict of interest mitigation plan to the Director. The Director must approve the plan in writing, before the verification can be completed.

The Compromised Impartiality Form provides instructions for such cases.

36. Do CO_2 emissions associated with combustion of biomass (e.g., black liquor or bark/hog fuel at a pulp mill) have to be verified?

No. Subsection 10(2) of the Regulation states that verification is not required for CO_2 emissions from combustion of biomass. However, verification of CH_4 and N_2O emissions from biomass fuel combustion is required.

For fuel mixtures containing biomass and non-biomass, verifiers may need to evaluate emissions from both types of fuels in order to determine if the non-biomass emissions are calculated in accordance with the Guideline.

37. In determining the net result of summing overstatements and understatements resulting from errors, omissions and misstatements, can an overstatement be cancelled out by an understatement?

Yes. The term “net result” referred to in subsection 10(5) paragraph 1 of the Regulation stipulates that if two errors are identified, one negative and one positive, they may interact mathematically in a way that decreases the overall per cent discrepancy (PD) of the emissions statement.

For example, if the verifier finds that the reporter understated one emission source by 500 tonnes of CO_2e and overstated another one by 500 tonnes, the two errors may cancel each other out in the determination of PD as defined in subsection 10(5) paragraph 1 of the Regulation.

However, the judgment of the AVB is still required when the errors, omissions or misstatements identified make it probable that there is more than a 5% PD.

For example, an AVB finds both large negative and large positive discrepancies in the reported emissions of various sources at a facility. While these discrepancies may act to cancel each other out in the calculation of the PD for the facility, in the AVB's judgment, these discrepancies may be indicative of a systematic issue with the reporter's equipment or systems. In this case, the AVB may determine that the aggregate effect of these variances do represent a material discrepancy in the emissions report.

It is also important to note that materiality is not only quantitative, but can also be qualitative; therefore discrepancies that fall below the 5% PD threshold are not necessarily insignificant. An AVB may determine that qualitative material discrepancies exist related to transparency or bias in the presentation of information in an emissions report.

38. Does GHG information, such as nameplate capacity and production data (which are not used for GHG calculations), need to be verified?

Subsection 10 (4) of the Regulation requires verification of an emissions report for the purpose of determining whether there is a reasonable level of assurance that an emissions report contains material discrepancy (5% discrepancy) and whether the report was prepared in accordance with Sections 4 and 6 of the Regulation. In another words, the verifier should verify data the facility used to calculate emissions and that the monitoring and calculations are done in accordance with the Guideline.

The Regulation also requires a facility to report additional data that are not directly related to the emissions calculation, such as nameplate capacity and production data. As long as it reported these data in its emissions report it has met the Regulation requirement and further verification would not be needed.

39. Can an AVB perform verification for a facility for two consecutive years, cease for one year, and then resume verification for the same facility in the fourth year?

No. According to subsection 14(4) of the Regulation, if an AVB performs two or more consecutive verifications of a facility's emissions report and then stops, it may not perform the verification of that facility's emissions again until at least three reporting periods have passed.

In other words, if an AVB conducts a verification for the same facility in 2012 and 2013 but not 2014 then two additional years must pass before the AVB can verify the emissions report for that facility (i.e., verification could only resume in 2017).

40. Can an AVB begin verification before the facility submits its emissions report via Environment Canada's Single Window?

Yes. There are no specific requirements in the Regulation around when verification can start, and some reporters prefer to engage an AVB earlier than others. However, the verification statement must be available for the final emissions report that is submitted to the MOE via Environment Canada's Single Window.

41. Can subcontractors be part of the verification team?

Yes. There are no provisions in the Regulation that prevent an AVB from staffing the verification team with subcontractors. Any subcontractor(s) that is part of the verification team are subject to the compromised impartiality provisions under section 14.

However, under subsection 8(c) a sub-contractor that is part of the verification team may not further sub-contract any of their work to another person.

42. Does a facility require verification if its emissions are below 25,000 tonnes of CO_2e in a given year when its emissions in the preceding year were above 25,000 tonnes?

Yes. Subsection 5(2) of the Regulation does not allow for a facility to cease reporting unless it generates less than 25,000 tonnes of CO_2e for three consecutive years, and it must resume reporting if 25,000 tonnes of CO_2e or more is generated in any subsequent reporting period.

This means that facilities that fall below the threshold must still submit emissions reports and verification statements each year until three consecutive verified emissions reports state that the facility's emissions were below the threshold or until the facility permanently ceases operation.

43. Can a body involved in the verification, who is not an AVB, contract with the facility for the verification services?

No. According to the ISO 14065 clause 5.2, the AVB shall have a legal contract with the facility. Any other body involved in the verification activities must be a subcontractor of the AVB.

44. If an AVB discovers that another AVB is acting in a manner that does not conform with ISO 14065 requirements, what can they do?

Both American National Standards Institute (ANSI) and Standards Council of Canada (SCC) have processes in place to handle complaints against AVBs. The accreditation body will process all valid complaints and investigate according to their procedures. According to those current standards, the outcome of the investigation, including any suggested corrective actions, will be communicated in writing to the complainant.

45. If the Ministry discovers an AVB has potentially acted in a manner that does not conform with ISO 14065 requirements, what will the Ministry do?

The Ministry will bring the matter to the attention of the appropriate accreditation body (AB) to investigate. According to their current standards, the AB may decide to place the AVB on probation, or suspend or withdraw their accreditation if the AB determines that the AVB has not complied with the relevant terms and conditions of accreditation.

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